

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INTERNATIONAL BUSINESS MACHINES CORPORATION,)	
)	
)	
Plaintiff,)	C.A. No. 16-122-LPS
)	
v.)	JURY TRIAL DEMANDED
)	
GROUPON, INC.)	
)	
Defendant.)	

MOTION FOR ADMISSION PRO HAC VICE

Pursuant to Local Rule 83.5 and the attached certification, counsel moves the admission pro hac vice of Brian D. Matty of DESMARAIS LLP, 230 Park Avenue, New York, NY 10169 to represent Plaintiff International Business Machines Corporation in this matter.

OF COUNSEL:

John M. Desmarais
Jon T. Hohenthanner
Karim Oussayef
Laurie N. Stempler
Robert C. Harrits
Elizabeth Kimmel
Michael J. X. Matulewicz-Crowley
DESMARAIS LLP
230 Park Avenue
New York, NY 10169
Tel: (212) 351-3400

POTTER ANDERSON & CORROON LLP

By: /s/ Bindu A. Palapura

David E. Moore (#3983)
Bindu A. Palapura (#5370)
Stephanie E. O'Byrne (#4446)
Hercules Plaza, 6th Floor
1313 N. Market Street
Wilmington, DE 19801
Tel: (302) 984-6000
dmoore@potteranderson.com
bpalapura@potteranderson.com
sobyne@potteranderson.com

*Attorneys for Plaintiff
International Business Machines Corporation*

Dated: March 10, 2017
1247726 / 43155

ORDER GRANTING MOTION

IT IS HEREBY ORDERED counsel's motion for admission pro hac vice is granted.

Date: _____

United States District Judge

CERTIFICATION BY COUNSEL TO BE ADMITTED PRO HAC VICE

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court, am admitted, practicing and in good standing as a member of the Bars of the State of New York and the Commonwealth of Massachusetts and pursuant to Local Rule 83.6 submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify I am generally familiar with this Court's Local Rules.

In accordance with Standing Order for District Court Fund effective 7/23/09, I further certify that the annual fee of \$25.00

- ☐ has been paid to the Clerk of the Court
- ☒ will be submitted to the Clerk's Office upon the filing of this motion

Date: March 10, 2017

Signed: /s/ Brian D. Matty

Brian D. Matty
DESMARAIS LLP
230 Park Avenue
New York, NY 10169
Tel: 212-351-3400
bmatty@desmaraisllp.com